



Kelly T. Currie
kcurrie@crowell.com
(212) 895-4270 direct

Crowell & Moring LLP
590 Madison Avenue
20th Floor
New York, NY 10022
+1.212.223.4000 main
+1.212.223.4134 fax

June 1, 2023

VIA ECF

Hon. Judge Lorna G. Schofield
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Liaquat Cheema, et al., 22-CR-00615(LGS)
Unopposed Request for Modification of Scheduling Order

Dear Judge Schofield:

On behalf of defendant Ali Cheema and all other defendants (together, the “Defendants”) in the above-captioned action, we respectfully request that Your Honor modify the scheduling order of March 27, 2023 (ECF No. 59), for the reasons set forth below. We have conferred with counsel for the Government, who does not oppose our request and consents to our proposed due dates. The Defendants and the Government respectfully request that the Court exclude time under the Speedy Trial Act, as set forth below.

Defendants respectfully request that the scheduling order be modified by extending the existing due dates by approximately 90 days, as follows:

Event	Original Due Date	Proposed New Due Date
Defendants’ Motions	June 6, 2023	Wednesday, Sept. 6, 2023 (92 days from June 6)
Government’s Responses	July 5, 2023	Friday, Oct. 6, 2023 (30 days from Sept. 6)
Defendants’ Replies	July 19, 2023	Friday, Oct. 20, 2023 (14 days from Oct. 6)
Status Conference	July 17, 2023, at 10:30 AM	Whichever date Your Honor deems appropriate

As Your Honor knows, the Court appointed Julie de Almeida as Coordinating Discovery Attorney (“CDA”) on February 10, 2023, to help process and facilitate the voluminous discovery in this case. See ECF No. 55. Since her appointment as CDA, Ms. de Almeida has been in continuous contact with the Government, including obtaining copies of the discovery previously produced to Defendants.



Today, Ms. de Almeida provided counsel for Defendants with a searchable hard drive containing discovery from the Government, which contains roughly 5 million files. In light of the recent receipt of this voluminous discovery, Defendants respectfully request additional time in order to adequately review the discovery prior to the upcoming due date for Defendants' motions.

This is Defendants' second request to modify the scheduling order seeking additional time, which the Court previously granted (See ECF Nos. 58–59.). We have conferred with counsel for the Government, who does not oppose our request.

Upon reviewing the discovery, should Defendants determine that we may need additional time to prepare motions, we will seek a further modification at the appropriate time, setting forth the bases for any such request.

Defendants and the Government respectfully request that the Court exclude time under the Speedy Trial Act between June 5, 2023 until the date set by the Court for the status conference. The Court previously excluded time until June 5, 2023. See ECF No. 49. The ends of justice served by excluding the time outweigh the best interests of the public and the Defendants in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because it will allow time for the Defendants to review discovery, contemplate the filing of any motions, and engage in discussions of potential resolutions of this case.

Thank you for Your Honor's consideration, and we remain available to discuss any questions Your Honor may have.

Application Granted. Defendants' motion(s) shall be filed by **September 6, 2023**. The Government's response shall be filed by **October 6, 2023**. Defendants' reply shall be filed by **October 20 2023**. The status conference currently scheduled for July 17, 2023, is adjourned to **November 13, 2023, at 10:30 a.m.** The Court finds that the ends of justice served by excluding the time between today and November 13, 2023, outweigh the best interests of the public and the Defendants in a speedy trial as provided in 18 U.S.C. § 3161(h)(7)(A) because it will allow time for the Defendants to review discovery, contemplate the filing of any motions, and engage in discussions of potential resolutions of this case. It is hereby ORDERED that the time between today and November 13, 2023, is excluded. The Clerk of the Court is directed to terminate the letter motion at docket number 60.

Dated: June 2, 2023
New York, New York

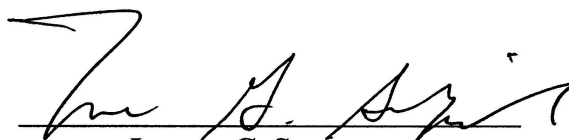
Respectfully submitted,

Crowell & Moring LLP



Kelly T. Currie
Anand Sithian
590 Madison Avenue
20th Floor
New York, NY 10022
Telephone: 212-223-4000
Email: kcurrie@crowell.com
asithian@crowell.com

Attorneys for Defendant Ali Cheema



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE